STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

IN RE: THE NARRAGANSETT ELECTRIC)	
CO.D/B/A NATIONAL GRID'S TARIFF)	
ADVICE NET METERING PROVISION)	
RIPUC NO. 2207 (FILED 1/26/18))	
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MOTION TO INTERVENE BY THE COALITION FOR COMMUNITY SOLAR ACCESS

By its attorneys, the Coalition for Community Solar Access (CCSA), moves to intervene in the above-captioned proceeding pursuant to Rule 1.13 (a) and (b) of the Rhode Island Public Utilities Commission (PUC) Rules of Practice and Procedure (Rules). In support of this motion, CCSA states:

- CCSA is a business-led trade organization, comprised of over 40 member companies, that
 works to expand access to clean, local, affordable energy nationwide through community
 solar. CCSA's mission is to empower energy consumers, including renters, homeowners,
 businesses and households of all socio-economic levels, by increasing their access to reliable
 clean energy.
- 2. CCSA, in partnership with a thriving network of non-profits, affiliate trade associations, and allied stakeholders, serves as the central voice for the community solar industry in developing vibrant and sustainable markets for community solar. CCSA members are active nationwide and have been actively engaged in Rhode Island's community solar programs.
- 3. Rule 1.13 states "any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission."

- 4. Rule 1.13(b) defines an intervening interest as, "[a]n interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding" or "[a]ny other interest of such nature that movant's participation may be in the public interest." R.I. Code R. 53-2-16:17.
- 5. As a national trade association that represents the community solar industry and advocates for the unique value of community solar, CCSA and its members offer a distinct perspective and set of interests that is not represented by other parties to this proceeding.
- 6. The issues under consideration in this proceeding have a direct impact on CCSA member companies that are participating in the Rhode Island community solar market today (as developers, contractors, or service providers) or are planning to do so.
- 7. In this proceeding, CCSA seeks to implement a very specific amendment to the community remote net metering provisions that allows community projects more forgiveness for project delays beyond their control, as has been allowed as a matter of administrative discretion in Rhode Island's Renewable Energy Growth program.
- 8. While the Commission has expressed interest in limiting the scope of this docket to the tariff revisions required as a result of changes to the net metering statute, this proceeding represents CCSA's opportunity to raise this discreet tariff issue that is an unnecessary and inappropriate impediment to the development of community remote net metering projects in Rhode Island.
- 9. CCSA will advocate for this amendment that is consistent with the public interest as put forth in many Rhode Island statutes and public policies and as are manifest in the projects in which CCSA members have interest including, but not limited to, electric supply diversification, energy security and resilience, stable and reduced energy costs, job creation and environmental benefit.

10. We have informed the service list of CCSA's intent to intervene pursuant to Rule 1.13(e) and have yet to be informed of any objection.

Please direct service of any correspondence or pleadings in connection with this proceeding to:

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and

Jeff Cramer Executive Director The Coalition for Community Solar Access P.O. Box 65491 Washington DC 20035

WHEREFORE, CCSA asks that the PUC grant this Motion to Intervene.

Respectfully submitted,

THE COALITION FOR COMMUNITY SOLAR ACCESS

By their attorneys,

Handy Law, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2018, I sent a true copy of the document by electronic mail to the PUC and the service list and filed the original pleading and 9 photocopies with the PUC.

Helen D. Anthony